

RESPONSE TO COMMENTS

**Response to Alabama Department of Environmental Management
and U.S. Environmental Protection Agency Comments
Draft Site Investigation Report
Former Range 42, Parcel 96Q; Range, Choccolocco Corridor, Parcel 145Q-X; and Impact
Area, Choccolocco Corridor, Parcel 148Q-X (dated April 2003)**

Comments from Stephen A. Cobb, Chief, Governmental Hazardous Waste Branch, ADEM Land Division and Doyle T. Brittain, EPA Senior Remedial Project Manager, dated January 22, 2004.

- Comment 1:** Throughout the document, figures illustrating analytical results indicate up to eight significant digits for the SSSL values making it difficult to read and compare. The number of significant figures should be consistent.
- Response 1:** Agree. The figures will be revised per comment.
- Comment 2:** Table 3-1: For sample location HR-145Q-DEP01, the table indicates that a depositional soil sample was collected from the swampy area in the eastern portion of the parcel. The text fails to indicate conditions present in the swampy area. It is unclear to ADEM and EPA if this area is soil, sediment, and/or if surface water is present. Please clarify.
- Response 2:** The swampy area was dry at the time of sample collection. Table 3-1 will be revised for clarification.
- Comment 3:** Table 3-1: For sample location HR-145Q-SW/SD02, the table indicates that surface water and sediment samples were collected from an intermittent stream present at this location. According to Figure 3-1, the sample site is located where the stream enters the parcel. It is unclear to ADEM and EPA why this location was selected. It appears, according to the figure, that any possible contaminated sediment for this site would be located downstream of this sample location. Please clarify.
- Response 3:** As noted in Table 3-8 of the report, this sample location was inadvertently placed at the same location as HR-131Q-SW/SD01 from adjacent Parcel 131Q-X. Therefore, HR-145Q-SW/SD02 was moved farther upstream. The report will be revised to include sample location HR-131Q-SW/SD01 for downstream coverage.
- Comment 4:** Appendix A: The reason for using chain of custody (COC) forms is the ability to reconstruct the custody of the samples from time of collection until time of receipt by the analytical laboratory. Signatures must be present at the appropriate location on the appropriate forms. The

sampling records in this appendix will not allow for the reconstruction of the COC for the following reasons:

- On all but two of the sample collection logs (SCLs), the sampling team members' names are printed, not signed.
- On one of the SCLs, the sampling team members were not identified.
- The name of the person relinquishing custody on the COC form does not appear on the sample collection logs.
- On two of the COC forms, the "Relinquished By" block contains a printed name, not a signature.
- On four of the COC forms, the "Received By" block contains printed names, not signatures.

Response 4:

Disagree. The main thrust of the reviewer's comment regards chain of custody yet the first two bullets above address irregularities with the sample collection logs (SCL). Chain of custody is documented on the COC form as noted by the reviewer in the comment. While Shaw agrees that the SCLs should have been thoroughly completed as a matter of course, the irregularities therein do not invalidate the chain of custody because that is not their purpose.

With regard to the third bullet, Shaw followed the procedures outlined in Section 6.1.7.1 *Field Custody Procedures* presented in the *Draft Installation-Wide Sampling and Analysis Plan*, Revision 3, February 2002 (SAP). This section states, "The sampling team, sample coordinator, and site manager will maintain overall responsibility for the care and custody of the samples until they are transferred or properly dispatched to the on-site screening facility and/or fixed-based laboratory." In addition, SAP Section 6.1.7.2 *Transfer of Custody and Shipment* states, "General custody of the sample will be maintained by the sample collection team members from the time of collection in the field through preparation and shipment to the laboratory. The main custody transfer will occur when the sample shipment is received into the laboratory from the field and is documented." Similar language is also provided in the QAP.

Using these two sections as guidance, all Shaw field personnel who are responsible for the collection of field samples (which includes the sample coordinator and the site manager) were considered part of the "sample team." No custody transfer record was considered necessary among members of the *same* sample collection team. If another contractor, a subcontractor to Shaw, the Army, or other personnel had collected samples and transferred them to

Shaw for processing or analysis, then the transfer of custody of those samples would have been formally recorded using a COC form.

Multiple sample technicians were responsible for collecting samples and completing the sample collection logs. The samples and logs were funneled to the Shaw sample coordinator, who then reviewed the documentation, inventoried all of the samples collected, and compiled a single COC record to list all the samples collected (daily) for transfer to the receiving analytical laboratories. Therefore, the sample coordinator's signature on the form represents the transfer of custody from the Shaw sample team in the field to the analytical laboratory personnel (per Section 6.1.7.2 of the SAP). Shaw believes that this is satisfactory custody transfer documentation and, therefore, does not agree this indicates that sample custody was not maintained as stated in the comment. Shaw personnel followed the same chain-of-custody procedures that have been in effect since the beginning of the FTMC project in 1998. It is perplexing that until now these issues have never been called into question.

However, in light of recent comments received by ADEM and EPA, Shaw has changed its COC procedures to include a separate COC for each sample collection team. Each sample collection team will submit samples, COCs, and SCLs to the sample coordinator. The SCLs and COCs will be reviewed by the sample coordinator prior to taking possession of the samples and signing the COC. This process will be repeated for each sample collection team in the field. The COCs will then be copied for the field records and maintained onsite. The original forms will be transmitted to the office for filing in the project central files. In future reports, this appendix will include all "supplementary" sample team COCs to document intra-team custody transfers and all SCLs.

Regarding the last two bullets: Are ADEM and EPA implying that someone's "signature" can only be made through cursive writing? If an individual willingly marks a document and affirms that the mark is indeed his own, then the manner in which that mark is made and the form that mark takes are irrelevant. For the reviewers' information, the "Relinquished By" blocks on *all* of the COCs contained cursive-written signatures.